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1 but nothing in writing.

2 MR. BERMAN: Off the record for a second?

3 MR. BEGAKIS: Sure.

4 MR. BERMAN: Do you guys want to take a
5 break?

6 MR. BEGAKIS: We're not off the record,
7 so --

8 MR. BERMAN: Yeah. Ms. Reporter, if we
9 can just go off the record for a second.

10 (Off the record.)

11 THE DIGITAL REPORTER: It is 4:36 p.m.
12 Eastern Time, and we are back on the record.

13 BY MR. BERMAN:

14 Q Mr. Martinez, so earlier we were -- you
15 testified that there was previous litigation between
16 Hyphy and Yellowcake, correct?

17 A Correct.

18 Q And in fact, there's been more than one
19 litigation between Hyphy and Yellowcake, correct?

20 A Correct --

21 MR. BEGAKIS: Objection. Outside the
22 scope of this deposition.

23 BY MR. BERMAN:

24 Q And you -- correct me if I'm wrong, but I
25 believe you testified earlier that you believe that the



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1 album Chuy Chavez y Sus Amigos was subject to one of the
2 prior lawsuits; is that correct?

3 A It was not subject to one of the prior
4 lawsuits; it was subject to one of the prior deals with
5 Chuy Chaves, Jr.

6 Q Okay. And just to be clear, you're claiming
7 that Hyphy had the right to distribute the album
8 pursuant to an oral agreement with Chuy Chavez, Jr.; is
9 that correct?

10 A Correct --

11 MR. BEGAKIS: Objection to the extent it
12 misstates the witnesses prior testimony.

13 BY MR. BERMAN:

14 Q And you recall being -- or Hyphy being sued in
15 or about September 20, 2019, by Yellowcake in Fresno
16 County Superior Court, correct?

17 MR. BEGAKIS: Objection. Outside the
18 scope of this deposition.

19 THE WITNESS: Can you remind me of the
20 case?

21 MR. BERMAN: Okay. I will.

22 BY MR. BERMAN:

23 Q Before we do that, do you recall ever entering
24 into any sort of settlement agreement between Hyphy and
25 Yellowcake?



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1 MR. BEGAKIS: Same objection.

2 THE WITNESS: Yes.

3 MR. BERMAN: Okay.

4 Please mark this document as Exhibit E,
5 please.

6 (Exhibit E Marked for identification.)

7 BY MR. BERMAN:

8 Q Mr. Martinez, have you ever seen this document
9 before?

10 A Yes.

11 Q And is this your signature on page 6 of the
12 document?

13 A Yes.

14 Q And what do you understand this document to
15 be?

16 A I'm glancing over because it's been such a
17 long time.

18 Q Sure. You can take a look.

19 MR. BEGAKIS: Yeah. I'm going to object
20 to this whole line of questioning as being outside of
21 the scope of this deposition.

22 THE WITNESS: I believe the document
23 speaks for itself. It's a settlement with Yellowcake on
24 their claims on Chuy Chavez, Jr. and the catalog that
25 was previously being distributed by Hyphy Music under a



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